

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

RECEIVED *HH*
SEP 20 3 57 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

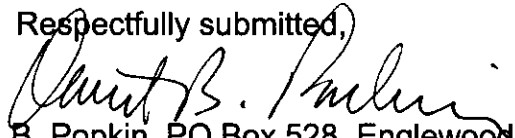
Docket No. C2001-3

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-1-30]

September 18, 2001

Pursuant to Order No. 1320, I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

Respectfully submitted,



September 18, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-1 Please refer to Paragraph 12 of the Declaration of Charles M. Gannon filed on July 30, 2001, ["Gannon Declaration"]. [a] Are Clearance Times for each of the Processing and Distribution Center ["P&DC"] the same for each of the types of processing dates, such as, weekday, Saturday, Sunday, and Holiday? [b] Is the Clearance Time at a given P&DC the same for all mail, such as, various overnight, 2-Day, and 3-Day locations? [c] Provide any other instances where there will be a difference in Clearance Time for a given P&DC. [d] Provide a more specific definition for the term "ready for final dispatch" for the Clearance Time, specifically the relationship between time that the mail starts moving away from the P&DC and the Clearance Time. [e] Please indicate any activities that take place between the Clearance Time and the departure of the mail from the P&DC including an approximate

time for each activity listed. [f] Please provide a listing of the Clearance Times for each P&DC. If there are different times for different circumstances, as noted in the response to subparts a, b, or c above, please indicate in the listing.

DBP/USPS-2 Please refer to Paragraph 12 of the Gannon Declaration. [a] Are Critical Entry Times for each of the Processing and Distribution Center ["P&DC"] the same for each of the types of processing dates, such as, weekday and Saturday? [b] Is the Critical Entry Time at a given P&DC the same for all mail, such as from various overnight, 2-Day, and 3-Day locations? [c] Provide any other instances where there will be a difference in Critical Entry Time for a given P&DC. [d] Provide a more specific definition for the term "can accept mail" for the Critical Entry Time, specifically the relationship between time that the mail arrives at the P&DC and the Critical Entry Time. [e] Please indicate any activities that take place between the arrival of the mail at the P&DC and the Critical Entry Time including an approximate time for each activity listed. [f] Please provide a listing of the Critical Entry Times for each P&DC. If there are different times for different circumstances, as noted in the response to subparts a, b, or c above, please indicate in the listing.

DBP/USPS-3 Please refer to Paragraph 16 of the Gannon Declaration. [a] Please provide a discussion and listing of the National parameters that were established regarding the designation of the Clearance and Critical Entry Times at various P&DCs. [b] Please provide copies of all memoranda, directives, electronic messages, etc. that were distributed to P&DCs to implement these National parameters. [c] What is the National "No Later Than" Clearance Time? [d] What is the National "No Earlier Than" Critical Entry Time?

DBP/USPS-4 [a] Please confirm that each P&DC in the country will dispatch mail to each of the other P&DCs in the country. [b] Please confirm that there are intermediate facilities, such as Area Distribution Centers, in the exchange of mail that is referenced in subpart a above. [c] Please discuss the utilization of the intermediate facilities, including whether they are utilized for overnight, 2-Day, and/or 3-Day mail,

referenced in subpart b above. [d] Please provide a listing of each of the intermediate facilities referenced in subpart b above. [e] Please provide information which will provide the details of the movement of mail from each P&DC to each of the other P&DCs in the country. [f] Please explain any items above that you are not able to confirm.

DBP/USPS-5 [a] Please confirm that the Clearance Time relates to an individual P&DC. [b] Do Clearance Times apply to any of the intermediate facilities? If so, please provide a listing of the intermediate facilities and their Clearance Times [including data if there are different times on different days or destinations]. [c] Please explain any items above that you are not able to confirm.

DBP/USPS-6 [a] Please confirm that Critical Entry Times apply to both P&DCs and intermediate facilities. [b] If so, please provide a listing of the intermediate facilities and their Critical Entry Times [including data if there are different times on different days or for other reasons]. [c] Please explain any items above that you are not able to confirm.

DBP/USPS-7 [a] Please advise if the Clearance Times and Critical Entry Times can be different at a given facility with respect to mail destined to different sub-facilities. For example, at ADC Facility X there will be a different CT with respect to mail destined to P&DC Facility A than for mail destined to P&DC Facility B [both P&DCs are under ADC Facility X]. [b] If so, please provide a listing showing these different times.

DBP/USPS-8 Please refer to Paragraph 18 of the Gannon Declaration. It is noted that a 12-hour highway drive-time was chosen to determine those areas that would be 2-Day delivery. [a] Was the Clearance Time at a given P&DC chosen as the starting time of the 12-hour time frame? If not, what time was chosen and what is the relationship of that time to the Clearance Time for that P&DC? [b] What is the requirement of the ending of the 12-hour time frame? Is it the Critical Entry Time at the ADC? Is it the Critical Entry Time at the individual destination P&DC? If not, what time

was chosen and what is the relationship of that time to the Critical Entry Time? [c] Please explain why 12 hours was chosen as opposed to some other time. [d] Please provide copies of any memoranda, electronic messages, etc. providing the discussion that ensued in determining the 12-hour standard.

DBP/USPS-9 Please refer to Paragraph 18 of the Gannon Declaration as it relates to two objectives. [a] Please provide the Postal Service's definition of "consistency" as it existed during Docket N89-1. Please respond to this interrogatory without requiring me to have a copy of the N89-1 data. [b] Please provide the Postal Service's current definition of "consistency". [c] Please discuss the reasons for implementing any changes that were made between the two definitions. [d] Please provide the Postal Service's definition of "2-Day service standard" as it existed during Docket N89-1. Please respond to this interrogatory without requiring me to have a copy of the N89-1 data. [e] Please provide the Postal Service's current definition of "2-Day service standard". [f] Please discuss the reasons for implementing any changes that were made between either of the two definitions.

DBP/USPS-10 Please refer to Paragraph 18 of the Gannon Declaration as it relates to the building of a computer model. [a] Please confirm that the computer model was utilized to determine highway drive-time between the two involved points. [b] Please confirm that those points that were 12 hours or less became 2-Day standard. [c] Please confirm that those points that were 12 hours and 1 minute or more became 3-Day standard. [d] Please confirm that all overnight points have a time of 12 hours or less. [d] Please provide a listing of those Origin-Destination ZIP Code pairs that have a time of 12 hours or less between them that are presently receiving 3-Day delivery standards. [e] Please provide a listing of those Origin-Destination ZIP Code pairs that have a time of 12 hours 1 minute or more between them that are presently receiving 2-Day delivery standards. [e] Please explain any items above that you are not able to confirm.

DBP/USPS-11 Please refer to Paragraph 18 of the Gannon Declaration as it relates to the building of a computer model. [a] Please provide details of the "customized transportation software package" that was utilized in the computer model. What is the source of this package? Please provide a copy of the documentation for this package. [b] Please discuss all of the criteria that were used in building the computer model. [c] Please confirm, or explain if you are unable to do so, that the objective of this package was to achieve a realistic travel time between the two given points. [d] Please advise whether the following conditions were considered and utilized, and the extent to which they affected, in determining the travel time between the two given points: [1] The specific roads that would be utilized in transporting the mail between the two given points. [2] The authorized speed limits for these roads. [3] The average speed that vehicles travel on these roads at the time of the actual trip in transporting the mail between the two given points. [4] The extent to which traffic volume may affect the speed achieved. [5] The extent to which weather may affect the travel time. [6] The extent to which there are variations in the travel time as a result of the time of day. [7] The extent to which there are variations in the travel time as a result of the day of the week. [8] The extent to which there are variations in the travel time as a result of the season of the year. [9] The extent to which crossing of a time zone boundary is involved. [10] The extent to which there are differences in changing to Daylight Savings Time between the two points involved [one end changes while the other end doesn't]. [11] The extent to which the driver of the vehicle makes a planned stop for resting or other purposes including a change of drivers. [12] The extent to which it is necessary to transfer mail at an intermediate point.

DBP/USPS-12 [a] Please provide a listing of all facilities that will normally consolidate their mail on a given day by shipping it to another facility for processing, such as Hackensack NJ 076 sending all mail to Paterson NJ 074/075 on Saturdays. [b] Please provide a listing of all facilities that normally process outgoing mail on Sunday.

DBP/USPS-13 Please confirm, or explain if you are unable to, that the service standards are the same for any given Origin-Destination ZIP Code pair regardless of:

[a] The day of the week the article is mailed. [b] The method that is utilized to pay postage on the article, such as, stamps, postage meters, permit imprints, etc. [c] The method that is utilized to address the article, such as handwritten, hand printed, typed, printed, with or without a bar code, etc. [d] The shape and type of the article, such as, cards, machineable envelopes, non-standard envelopes, flats, parcels, rolls, etc. [e] Whether, or not, the article has any additional services, such as Certified or Registered Mail.

DBP/USPS-14 Please advise the various categories, such as those mentioned in DBP/USPS-13, for which the Postal Service has separate data for [a] EXFC results [b] ODIS results.

DBP/USPS-15 Please confirm, or explain if you are unable to, that for any given P&DC, the service standards are the same regardless of where the article is mailed, so long as it is entered into the system on the day of mailing in an area that is under the jurisdiction of that P&DC.

DBP/USPS-16 Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses. [a] Please advise the minimum area that may be included in an area that is receiving overnight service from a given P&DC. For example, may it be limited to a 5-digit ZIP Code, a 3-digit ZIP Code prefix, all of the 3-digit ZIP Code prefixes under the jurisdiction of a given P&DC, the area under the jurisdiction of a given ADC, etc. [b] Same as subpart a, except for an area that is receiving 2-Day service. [c] Same as subpart a, except for an area that is receiving 3-Day service.

DBP/USPS-17 [a] Please advise those Origin-Destination ZIP Code pairs where air transportation is utilized to transport mail which has an overnight delivery service. For each of these pairs, indicate whether or not the use of surface transportation would

have resulted in two or more day service. [b] Please advise those Origin-Destination ZIP Code pairs where air transportation is utilized to transport mail which has a 2-Day delivery service. For each of these pairs, indicate whether or not the use of surface transportation would have resulted in three or more day service.

DBP/USPS-18 Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses. [a] To what extent is reciprocity considered or utilized between two P&DC facilities that are overnight to each other. Namely, if P&DC B receives overnight service from P&DC A, what is the status of P&DC A receiving overnight service from P&DC B? [b] Same as subpart a except with respect to 2-Day service. [c] Same as subpart a except with respect to 3-Day service.

DBP/USPS-19 Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses. [a] To what extent is the volume, either an absolute volume or a percentage of the total volume, of mail from a given facility that is destined to another facility considered or utilized in evaluating those areas that will receive overnight service? Provide details of the volume or percentage levels. [b] Same as subpart a except with respect to 2-Day service.

DBP/USPS-20 Please discuss when Tours 1, 2, and 3 of a processing plant normally operate and the functions that are assigned to each of the three tours.

DBP/USPS-21 Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses. [a] To what extent should the existence of adjacent with contiguous borders 3-digit ZIP Code areas exist with a service standard of

3-Days between them [this would mean that “next-door neighbors” would have 3-Day delivery service standards between them]? [b] To what extent do local postal facilities circumvent the normal processing plan and exchange mail with that adjacent area so as to achieve overnight service in those instances where it would normally be three days?

DBP/USPS-22 Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses. To what extent is it desired to have all mail destined to locations within the same state as either overnight or 2-Day service standards?

DBP/USPS-23 Please furnish a copy of the service standards that existed at the time of Docket N89-1 as well as copies of all versions that have been released since that time. Please provide an explanation of the types and extent of changes that occurred between each of the versions provided.

DBP/USPS-24 Please refer to Paragraph 15 of the Gannon Declaration as it refers to the use of commercial air transportation service. [a] Provide a definition of the term “commercial air transportation service”. [b] Prior to the changes that were implemented in the past two years, please advise the percentage of 2-Day mail that was transported by surface, by commercial air transportation service, and by other means [specify the means and provide separate data for each means that transports 1% or more of the total volume]. [c] Same as subpart b except for current data. [d] Same as subparts b and c except for 3-Day mail. [e] Provide details and specific data over at least the past five years which will demonstrate the level of reliability of commercial air transportation. [f] Explain why the loss of reliability had a more significant impact on 2-Day mail. Also please state what the word “more” refers to.

DBP/USPS-25 Please refer to Paragraph 24 of the Gannon Declaration. [a] Please provide a copy of the referenced presentation, in the form of PowerPoint slides.

[b] Please provide copies of any other memoranda or directives that were utilized in the finalizing the 2 and 3-Day Service Standard effort.

DBP/USPS-26 In regard to the Service Commitments / performance goals for First-Class Mail, with regard to the delivery standards realignment that took place as a result of Docket N89-1 along with the experimental [which became permanent on September 23, 1989] realignment that took place prior to that in the Metropolitan New York City area, what percentage of the mail profile prior to that Docket and experiment shifted from [a] one-day to two-day delivery, [b] one-day to three-day delivery, [c] two-day to one-day delivery, [d] two-day to three-day delivery, [e] three-day to one-day delivery, and [f] three-day to two-day delivery? [g] What were the purposes of this realignment? [h] Did this realignment result in an increase in or a savings of costs associated with the mail processing and transportation [or any other areas]? [i] If so, provide the yearly change in costs for each year since the change. [j] Did this realignment result in a change in the consistency of mail delivery? [k] If so, provide the data for each year since the change. [l] Is there a specific request to the mailing public at regular intervals to inquire about potential changes desired in delivery standards? [m] If so, explain and provide details. If not, explain why not.

DBP/USPS-27 [a] Confirm in general that air transportation will be more costly than surface transportation. [b] Confirm in general that air transportation will provide more expeditious service than surface transportation. [c] If not, explain. [d] Is air transportation utilized in all instances where it would advance the delivery time for First-Class Mail by one or two days over that which may be obtained by utilizing surface transportation in whole or in part? [e] If not, why not and explain how the handling of this mail could be considered to be handled expeditiously. [f] Provide copies of any regulations, directives, or memoranda issued at Area or above level which specify when to utilize air transportation service. [g] Provide copies of any press releases, directives, or other memoranda which were issued at the Headquarters level to indicate the level of service that would be provided to First-Class Mail at the time that Air Mail was eliminated as a separate domestic service some twenty years ago. [h] Does the level

to which air transportation is utilized today match the level that was stated when Air Mail was eliminated as a separate service? [i] If not, explain how and why it does not.

DBP/USPS-28 [a] Does the USPS have a requirement that all mail which is placed into the system on a given day will be postmarked that day and will be processed that same day? [b] Does the USPS have a requirement that all mail turned in over a service window that is open to the public will be postmarked that day and will be processed that same day? [c] Does the USPS have a requirement that all mail turned into a city delivery, rural, or HCR carrier or which is collected by a carrier will be postmarked that day and will be processed on that day? [d] Does this apply to all delivery dates including Saturday? [e] Explain and elaborate on any negative answers.

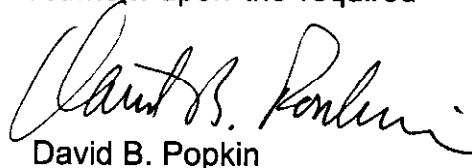
DBP/USPS-29 Please confirm, or explain if you are unable to do so, that Day 0 with respect to the determination of the services standards being either 1-, 2-, or 3-Days will be: [a] Mail which is presented to a retail service window clerk up to the time of the closing of the window. [b] Mail which is turned into or collected by a city delivery, rural, or HCR carrier on a given day. [c] Mail which is deposited in a collection box up to the time of the latest collection time shown on that box. [d] Mail which is turned in at a post office platform up to the designated time.

DBP/USPS-30 Please identify and provide copies of any USPS Inspection Service, USPS Inspector General, or General Accounting Office reports that have been issued with respect to service standards of First-Class Mail.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

September 18, 2001


David B. Popkin